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*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V.  
PRITT IN SUPPORT OF PLAINTIFFS'  
OBJECTIONS TO META'S REPLY  
EVIDENCE**

I, Maxwell V. Pritt, declare as follows:

I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Objections to Meta’s Reply Evidence.

1. Attached as **Exhibit A** is a true and correct copy of excerpts of the transcript of the deposition of Melanie Kambadur, which took place on September 17, 2024.

2. Attached as **Exhibit B** is a true and correct copy of excerpts of the transcript of the deposition of Joelle Pineau, which took place on November 6, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of April 2025 in San Francisco, California.

By:

/s/ Maxwell V. Pritt  
Maxwell V. Pritt